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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL No. 2843  
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED**

**CIVIL L.R. 7-11 and 79-5(f)**

Judge: Hon. Vince Chhabria  
Special Master Daniel Garrie  
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f) and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), Plaintiffs hereby submit this Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed.

	<b>Documents</b>	<b>Portions Sought to be Sealed</b>	<b>Evidence Offered in Support of Sealing</b>
1	Full 30(b)(6) Deposition Transcript of Allison Hendrix (May 5, 2022)	255:8 258:14-15 265:24-266:10 267:5-13 312:13-20 314:6-13	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)
2	Full Deposition Transcript of <b>Jackie Chang</b> (December 16, 2021) [Exhibit 106 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	6:8-9 6:12 6:15-16 6:18 6:21-22 7:8-9 7:12 7:14-15 7:18-19 7:21-22 7:24-25 8:8-9 8:12-13 8:16-17 8:23 9:5-7 9:9-11 9:17-19 9:21-22 10:5-6 22:4-6 23:2-18 24:12-15 25:15-23 29:21-30:2 39:8-11 41:5-13 41:16-25 42:4-12 42:19-44:10	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information or Highly Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)

	45:23-46:12 50:10-14 51:9-23 52:15-23 54:10-18 55:21-23 58:25-61:11 72:2 72:10-13 73:2-11 73:23-80:23 81:3-86:6 88:3-12 89:10-93:6 93:11-97:6 98:3-18 99:19-101:9 101:14-104:10 104:15-105:25 106:6-116:14 116:17-117:5 117:13-119:3 119:18-23 122:10-11 122:22-123:1 123:10-124:16 125:2-7 125:25-128:20 129:2-17 130:5-14 136:8-19 136:25-137:14 138:9-10 151:14 151:20-152:4 152:16-153:18 159:5-6 159:19-160:2 160:12-19 165:24-25 166:7-168:5 168:15-170:18 171:6-7 172:10-24 173:1-181:5 181:18-185:23 186:17-189:6	
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	192:7-16 192:20-25 193:4-194:14 195:6-21 196:2-197:10 199:11-200:2 215:2-8 215:14-216:18 221:11-223:2 226:4-228:8 230:14-16 230:22-236:4 236:16-240:24 262:12-263:18 266:21-22 267:5-13 268:2-269:23 271:22-25 273:7-11 273:14-280:8 282:8-284:6 284:23-287:7 287:22-288:15 295:6-297:1 297:7-21 298:3-7 298:16-304:15  Highly Confidential Information: 139:16-140:20 141:8-142:1 142:5-151:13 153:19-158:25 160:20-165:18 199:4-10 200:3-9 200:17-205:14 205:20-206:17 206:23-24 207:14-213:24 219:24-220:25 224:1-225:1 228:12-229:8 229:16-21 245:10-17 245:22-247:25	
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		248:25-257:20 288:16-290:24	
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Because the above documents contain, reference, or summarize materials designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action, Plaintiffs file the documents provisionally under seal. Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable.

Dated: August 24, 2022

Respectfully submitted,

**KELLER ROHRBACK L.L.P.**

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Derek W. Loeser

By: /s/ Lesley E. Weaver  
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*Plaintiffs' Co-Lead Counsel*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)**

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of August, 2022 in Oakland, California.

By: /s/ Lesley E. Weaver  
Lesley E. Weaver

**CERTIFICATE OF SERVICE**

I, Lesley E. Weaver, hereby certify that on August 24, 2022, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which will send electronic notification to all counsel of record. I also caused a copy of the under seal filing to be delivered to counsel for Defendant Facebook, Inc. via electronic mail.

/s/ Lesley E. Weaver  
Lesley E. Weaver